

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

UNITED STATES OF AMERICA,

v.

**VIOLET ANNE GOLDEN and
STEPHANIE BARNES,**

Defendants.

3:19-cr-47

**NOTICE OF RESPONSE TO THE COURT'S INQUIRY REGARDING THE
SUPERSEDING INDICTMENT**

COMES NOW, the United States of America, by and through Gretchen C.F. Shappert, United States Attorney for the District of the Virgin Islands and Nathan Brooks, Assistant United States Attorney, and hereby notifies this Honorable Court of its Response to the Court's Inquiry Regarding the Superseding Indictment [ECF no. 103].

On November 21, 2019, the Grand Jury returned a Superseding Indictment in the above-captioned case. The changes in the new charging document are summarized thusly:

- 1) Count 5 contains an additional overt act, at paragraph 27(n), alleging "On or about March 1, 2018, **VIOLET ANNE GOLDEN** provided **STEPHANIE BARNES** with false IRS Forms 1099-MISC for the 2016 and 2017 tax years that understated and concealed the true amount of Commission funds paid to Barnes"
- 2) Count 30 alleges that Stephanie Barnes filed a false tax return in the 2016 tax year.
- 3) Count 31 alleges that Stephanie Barnes failed to file a tax return in the 2017 tax year.

4) Count 22 from the original Indictment was removed.

Respectfully submitted,

GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY

Dated: November 25, 2019

By: /s/Nathan Brooks

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of November, 2019, I electronically filed the foregoing *Notice of Response to the Court's Inquiry Regarding the Superseding Indictment* with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties of record.

By: /s/Nathan Brooks
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